

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

JACK A. CLARKE,)
)
Plaintiff,)
)
v.) **2:06-cv-00508-ID-DRB**
)
CHARTER COMMUNICATIONS, INC.)
)
Defendant.)

MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

COMES NOW defendant Marcus Cable of Alabama, LLC (“Marcus”), misidentified as “Charter Communications, Inc.” in the Complaint, and respectfully moves this Court for the entry of the Agreed Protective Order, a copy of which is attached hereto as Exhibit 1. As grounds therefor, Marcus submits that all parties consent to the entry of the Agreed Protective Order and that entry of the Order will facilitate discovery, protect the parties’ interests in the confidentiality of business sensitive matters such as trade secrets and personnel information and will eliminate the need for repeated requests that the Court become directly involved in the discovery process.

Respectfully submitted,

s/Gordon L. Blair
David L. Warren, Jr.
Attorneys for Defendant,
Charter Communications, Inc.
Ogletree, Deakins, Nash, Smoak & Stewart, PC
One Federal Place, Suite 1000
1819 5th Avenue North
Birmingham, Alabama 35203-2118
Ph: 205-328-1900
Fax: 205-328-6000
Email: gordon.blair@odnss.com
Email: david.warren@odnss.com

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Mark Wayne Sabel, Sr.
Mark W. Sabel, Jr.
Maricia Woodham
Email: mwsabl@mindspring.com
Email: mksabel@mindspring.com
Email: mwoodham@sabellaw.com

s/Gordon L. Blair